

Olivia Karpinski

Cahill, et al. vs. Edalat, et al.

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE CENTRAL DISTRICT OF CALIFORNIA  
3                   SOUTHERN DIVISION  
4

5       BRUCE CAHILL, an individual, et  
6       al.,

7                               Plaintiffs,

8                               vs.

Case. No. 8:16-cv-  
00686-AG-DFM

9       PAUL PEJMAN EDALAT, an individual,  
10       et al.,

11                               Defendants.

12       \_\_\_\_\_  
13       AND RELATED CROSS-CLAIMS/  
14       COUNTERCLAIMS.  
15       \_\_\_\_\_

16                   VIDEOTAPED DEPOSITION OF OLIVIA KARPINSKI

17                   Newport Beach, California

18                   October 14, 2016  
19  
20  
21  
22

23       Reported by:  
24       Debby M. Gladish  
25       RPR, CCRR, CLR, CSR No. 9803  
      NCRA Realtime Systems Administrator  
      Job No. 10027932

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1 around his assistant and his daughter walked up on  
2 him. So he was implying these things. And it made  
3 me feel uncomfortable. I don't look at myself, you  
4 know, as that, but being a female in the company it  
5 made me feel really uncomfortable. And I felt like  
6 he was really advancing on me and I didn't know what  
7 to do.

8 **Q. So did he say anything else?**

9 A. Not that I recall, just those statements.

10 **Q. Did he touch you?**

11 A. Not that I recall.

12 **Q. Did he ever at any time touch you in or**  
13 **around your breast area to try to make sexual**  
14 **contact with you?**

15 A. More my shoulder.

16 **Q. Breast? "Yes" or "no."**

17 A. No.

18 **Q. How about the genital areas?**

19 A. No.

20 **Q. How about the buttock areas?**

21 A. No.

22 **Q. Okay. And he tried to kiss you on one**  
23 **occasion?**

24 A. Yes. He pulled me in and tried to kiss me.

25 **Q. Okay. And at that lunch he never tried to**

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1     **kiss you?**

2           A.     No.   But it was still very, very  
3     uncomfortable and awkward.

4           Q.     But I'm asking a specific question and my  
5     client has an entitlement to a right to that answer.

6                   He never, at that lunch, tried to kiss you;  
7     right?

8           A.     No.

9           Q.     Okay.   And no other inappropriate touching  
10    at that lunch?

11          A.     No.

12          Q.     Okay.   And no other inappropriate touching  
13    of the breast, genital or buttocks areas any other  
14    time?

15          A.     On my shoulder very closely, but, no.

16          Q.     Okay.   And when you went to the police for  
17    the first time, it was about specifically what, the  
18    attempted kiss?

19          A.     I told them the entire story.   I told them  
20    I didn't feel safe and I told them the entire story.

21          Q.     And when you went in, did you get the name  
22    of the officer?

23          A.     I didn't go in.   They came to me and I did  
24    not get the name of the officer.

25          Q.     You didn't ask them for their cards?

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1 A. The company I work for --

2 Q. And what's --

3 A. -- my phone number and my e-mail.

4 Q. And what's the company that you work for?

5 A. Well, I work for myself. It's AOK  
6 Consulting.

7 Q. Is that what the card says?

8 A. No, but I work with the company, Sentar, I  
9 have a business card for that company.

10 Q. And what does that company say your title  
11 is?

12 A. EVP of sales.

13 Q. Okay. All right. Can you take a look at  
14 page 23 of Exhibit 21.

15 A. Yes.

16 Q. You are describing here, starting at the  
17 top of page 23, quote, "Edalat left the conference  
18 room and moved to shake Cahill's hand as well. At  
19 this time Cahill pulled Karpinski in for a hug and  
20 kissed Karpinski against her will."

21 That is the same event that you were  
22 talking about before earlier in the complaint?

23 A. Yes.

24 Q. So he's attempted to kiss you, according to  
25 you, one time?

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1           A.     Yes.   He did kiss me.   It landed on my  
2   face, just not on my lips.

3           Q.     I didn't say otherwise.   I just said that  
4   was the one time that he attempted to kiss you.   And  
5   you say he attempted to kiss you on the lips?

6           A.     Yes.

7           Q.     All right.   But you deflected it?

8           A.     Yes.

9           Q.     Okay.   Now, go down to the bottom of  
10   page 23 of the same document, Exhibit 21, last  
11   sentence it says, "A maliciously false statement  
12   Cahill instigated Weimann to terminate his  
13   employment with Pharma Pak, Inc. that same day, as  
14   well as demand Karpinski's termination."

15                   What maliciously false statement are you  
16   referring to there?

17           A.     Bruce told Dr. Weimann that I said that  
18   Dr. Weimann was stealing patch material.   We had  
19   already had a conversation about the patches and how  
20   the cutting produced about a 40 percent waste, so  
21   that had something that had already been cleared up.  
22   Mr. Cahill stated to Dr. Weimann that I -- me -- I  
23   thought that he was stealing patch material.

24                   Dr. Weimann then got very upset, threatened  
25   to quit.   Bruce actually came in my office, slammed